

AB:NMA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ROBERT UNIQUE HAINES,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BRERETON, being duly sworn, deposes and states that he is a Deputy United States Marshal with the United States Marshals Service, duly appointed according to law and acting as such.

On or about June 26, 2018, within the Eastern District of New York and elsewhere, the defendant ROBERT UNIQUE HAINES, having been convicted of an offense, did knowingly and intentionally escape from the custody of the Attorney General or his authorized representative.

(Title 18, United States Code, Section 751(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all relevant facts and circumstances of which I am aware.

TO BE FILED UNDER SEAL

**COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT**

(18 U.S.C. § 751(a))

Case No. 21-MJ-1282

1. On or about September 17, 2007, the defendant ROBERT UNIQUE HAINES pleaded guilty in the Eastern District of Missouri to one count of escaping or attempting to escape from federal custody, in violation of Title 18, United States Code, Section 751(a), see Minute Entry, United States v. Haines, No. 07-CR-344 (CDP) (E.D. Mo. filed June 7, 2007), ECF No. 26 (the “Escape Case”); and one count of conspiracy against the United States, in violation of Title 18, United States Code, Section 371 and two counts of aggravated identity theft, in violation of Title 18, United States Code, Section 1028A, see Minute Entry, United States v. Haines, No. S-1 07-CR-345 (CDP) (E.D. Mo. filed June 28, 2007), ECF No. 29 (the “Fraud Case”). On or about February 8, 2008, the Honorable Catherine D. Perry, United States District Judge, sentenced HAINES to a total of 168 months’ imprisonment and three years of supervised release. In the Fraud Case, HAINES was sentenced to 108 months’ imprisonment and three years of supervised release. See Judgment, United States v. Haines, No. S-1 07-CR-345 (CDP) (E.D. Mo. filed June 28, 2007), ECF No. 277). In the Escape Case, HAINES was sentenced to 60 months’ imprisonment, to run consecutive to HAINES’s sentence in the Fraud Case, and three years of supervised release, to run concurrent to HAINES’s sentence in the Fraud Case. See Judgment, United States v. Haines, No. 07-CR-344 (CDP) (E.D. Mo. Filed June 7, 2007), ECF No. 38.

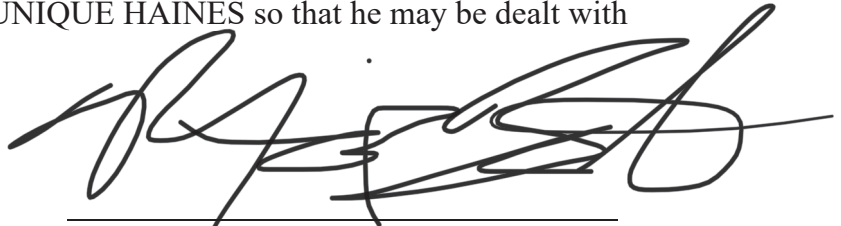
2. On or about February 1, 2018, HAINES was transferred from Federal Correctional Institution Butner, in Butner, North Carolina, to Brooklyn House, a residential reentry center in Brooklyn, New York. HAINES was not scheduled to be released from Brooklyn House until on or about July 19, 2018.

3. On or about June 26, 2018 at approximately 9:00 a.m., HAINES walked out of Brooklyn House without authorization or a pass. A Brooklyn House security guard followed HAINES on to York Street in Brooklyn and directed him, in sum and substance, to stop. HAINES ignored the guard's request and continued walking. HAINES was placed on escape status the same day.

4. As of the date of the filing of this Complaint, HAINES has not returned to Brooklyn House.

5. I respectfully request that this Court issue an order sealing, until further order of the Court, all materials submitted in support of this application, including the application and arrest warrant. Premature disclosure of these materials would give HAINES an opportunity to change patterns of behavior and to continue fleeing from or evading prosecution. Therefore, such disclosure would have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that a warrant issue for the arrest of the defendant ROBERT UNIQUE HAINES so that he may be dealt with according to law.

A handwritten signature in black ink, appearing to read 'Michael Brereton', written over a horizontal line.

MICHAEL BRERETON
Deputy United States Marshal
United States Marshals Service

Sworn to before me by reliable electronic means
this 8 day of November, 2021

/s/ Roanne L. Mann
THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK